
Dublin & District Schoolboys/Girls League (“DDSL”)
Retention Policy



1. The Purpose of This Policy

DDSL is firmly committed to complying with our data protection obligations. In this context, and to achieve consistency and excellence of service, we believe that it is important to have a policy setting out how we manage document retention.

The Data Protection Acts 1988 to 2018 and the General Data Protection Regulation (the 'GDPR') (together 'the Acts') impose obligations on us, as a Data Controller, to process personal data in a fair manner which notifies data subjects of the purposes of data processing and to retain the data for no longer than is necessary to achieve those purposes.

Under these rules, individuals have a right to be informed about how their personal data is processed. The Acts sets out the information that we should supply to individuals and when individuals should be informed of this information. We are obliged to provide individuals with information on our retention periods or criteria used to determine the retention periods.

Through this policy, and our data retention practices, we aim to meet the following commitments:

- We comply with legal and regulatory requirements to retain data.
- We comply with our data protection obligations to keep personal data no longer than is necessary for the purposes for which it is processed (storage limitation principle).
- We handle, store and dispose of data responsibly and securely.
- We create and retain data where we need this to operate our organisation effectively, but we do not create or retain data without good business reason.
- We allocate appropriate resources, roles and responsibilities to data retention.
- We regularly remind employees of their data retention responsibilities.

We regularly monitor and audit compliance with this policy and update this policy when required.

2. GROUNDS FOR PROCESSING

Under the Acts, DDSL is required to provide data subjects with the legal grounds or lawful basis that they are relying on for processing personal data.

The legal grounds for processing personal data are as follows:

- Consent.
- Performance of a contract.
- Legal obligation.
- Vital interest.
- Public interest; or
- Legitimate interests.

DDSL may be able to rely on a number of legal bases for collecting personal data. For example, as employers, DDSL can justify processing an employee's personal data as necessary for the performance of a contract and as part of a statutory requirement.

If there is no justification for retaining personal information, then that information should be routinely deleted. Information should never be kept "just in case" a use can be found for it in the future.

3. ROLES AND RESPONSIBILITIES

We aim to comply with the laws, rules, and regulations that govern our organisation and with recognised compliance good practices. All employees must comply with this policy, the Record Retention Schedule, any communications suspending data disposal and any specific instructions from dataprivacy@ddsl.ie. Failure to do so may subject us, our employees, and contractors to serious civil and/or criminal liability. An employee's failure to comply with this policy may result in disciplinary sanctions, including suspension or termination. It is therefore the responsibility of everyone to understand and comply with this policy.

Through dataprivacy@ddsl.ie we are responsible for identifying the data that we must or should retain, and determining the proper period of retention. It also arranges for the proper storage and retrieval of data, co-ordinating with outside vendors where appropriate. Additionally, through dataprivacy@ddsl.ie we handle the destruction of records whose retention period has expired.

dataprivacy@ddsl.ie is responsible for:

- Administering the data management programme.
- Helping department heads implement the data management programme and related best practices.
- Planning, developing, and prescribing data disposal policies, systems, standards, and procedures; and
- Providing guidance, training, monitoring and updating in relation to this policy.

4. DOCUMENT RETENTION PROCEDURE

We are required to retain certain records, usually for a specific amount of time. The accidental or intentional destruction of these records during their specified retention periods could result in the following consequences:

- Fines and penalties.
- Loss of rights.
- Obstruction of justice charges.
- Contempt of court charges.
- Serious disadvantages in litigation.

We must retain certain records because they contain information that:

- have enduring value to our organisation for example, they provide a record of a business transaction, evidence DDSL's rights or obligations, protect our legal interests or ensure operational continuity.
- Must be kept in order to satisfy legal, accounting or other regulatory requirements.

We must balance these requirements with our statutory obligation to only keep records for the period required and to comply with data minimisation principles. The retention schedule below sets out the relevant periods for the retention of DDSL's documents.

5. TYPES OF DATA AND DATA CLASSIFICATIONS

Certain data is very important to us and is therefore listed in the Record Retention Schedule. This may be because we have a legal requirement to retain it, or because we may need it as evidence of our transactions, or because it is important to the running of our business. Please see section 6 below for more information on retention periods for this type of data.

Disposable information consists of data that may be discarded or deleted at the discretion of the user once it has served its temporary useful purpose and/or data that may be safely destroyed because it is not a formal or official record as defined by this policy and the Record Retention Schedule. Examples may include:

- Duplicates of originals that have not been annotated.
- Preliminary drafts of letters, memoranda, reports, worksheets, and informal notes that do not represent significant steps or decisions in the preparation of an official record.
- Books, periodicals, manuals, training binders, and other printed materials obtained from sources outside of DDSL and retained primarily for reference purposes.
- Spam and junk mail.

Please see section 6 below for more information on how to determine retention periods for this type of data.

Both formal or official records and disposable information may contain personal data; that is, data that identifies living individuals (personal data). The Acts require us to retain personal data for no longer than is necessary for the purposes for which it is processed (principle of storage limitation). See section 6 below for more information on this.

6. RETENTION PERIODS

Any data that is part of any of the categories listed in the Record Retention Schedule contained in the Annex to this policy, must be retained for the amount of time indicated in the Record Retention Schedule. A record must not be retained beyond the period indicated in the Record Retention Schedule, unless a valid business reason (or notice to preserve documents for contemplated litigation or other special situation) calls for its continued retention. If you are unsure whether to retain a certain record, contact dataprivacy@ddsl.ie.

The Record Retention Schedule will not set out retention periods for disposable information. This type of data should only be retained for as long as it is needed for business purposes. Once it no longer has any business purpose or value it should be securely disposed of.

As explained above, data protection laws require us to retain personal data for no longer than is necessary for the purposes for which it is processed (principle of storage limitation). Where data is listed in the Record Retention Schedule, we have taken into account the principle of storage limitation and balanced this against our requirements to retain the data.

What to do if data is not listed in the Record Retention Schedule. If data is not listed in the Record Retention Schedule, it is likely that it should be classed as disposable information. However, if you consider that there is an omission in the Record Retention Schedule, or if you are unsure, please contact dataprivacy@ddsl.ie.

7. STORAGE, BACK-UP AND DISPOSAL OF DATA

Storage

Our data must be stored in a safe, secure, and accessible manner. Any documents and financial files that are essential to our business operations during an emergency must be duplicated and/or backed up at least once per week and maintained off site.

Destruction

Our data protection is responsible for the continuing process of identifying the data that has met its required retention period and supervising its destruction. The destruction of confidential, financial, and employee-related hard copy data must be conducted by shredding if possible. Non-confidential data may be destroyed by recycling. The destruction of electronic data must be coordinated with dataprivacy@ddsl.ie.

The destruction of data must stop immediately upon notification from the dataprivacy@ddsl.ie that preservation of documents for contemplated litigation is required (sometimes referred to as a litigation hold). This is because we may be involved in a legal claim or an official investigation (see next paragraph). Destruction may begin again dataprivacy@ddsl.ie lifts the requirement for preservation.

8. SPECIAL CIRCUMSTANCES

We require all employees to comply fully with our Record Retention Schedule and procedures as provided in this policy. All employees should note the following general exception to any stated destruction schedule: If you believe, or dataprivacy@ddsl.ie informs you, that certain records are relevant to current litigation or contemplated litigation (that is, a dispute that could result in litigation), government investigation, audit, or other event, you must preserve and not delete, dispose, destroy, or change those records, including emails and other electronic documents, until dataprivacy@ddsl.ie determines those records are no longer needed. Preserving documents includes suspending any requirements in the Record Retention Schedule and preserving the integrity of the electronic files or other format in which the records are kept.

If you believe this exception may apply, or have any questions regarding whether it may apply, please contact dataprivacy@ddsl.ie.

In addition, you may be asked to suspend any routine data disposal procedures in connection with certain other types of events, such as our merger with another organisation or the replacement of our information technology systems.

9. THE ROLE OF THE DATA PROTECTION CONTACT IN RECORDS MANAGEMENT

Our Data Protection Contact, dataprivacy@ddsl.ie in conjunction with senior management, is responsible for identifying the documents that we must or should retain, and determining, in collaboration with the proper period of retention. The responsibilities of the Data Protection contact dataprivacy@ddsl.ie include:

- 1) Arranging for the proper storage and retrieval of records, coordinating with outside vendors where appropriate.
- 2) Handling the destruction of records whose retention period has expired.
- 3) Planning, developing and prescribing document disposal policies, systems, standards and procedures.
- 4) Monitoring departmental compliance so that employees know how to follow the document management procedures and the Legal Department has confidence that DDSL' records are controlled.
- 5) Ensuring that senior management is aware of their departments' document management responsibilities.
- 6) Developing and implementing measures to ensure that the Legal Department knows what information DDSL has and where it is stored, that only authorised users have access to the information, and that DDSL keeps only the information it needs, thereby efficiently using space.
- 7) Establishing standards for filing and storage equipment and recordkeeping supplies.
- 8) In cooperation with department heads, identifying essential records and establishing a disaster plan for each office and department to ensure maximum availability of DDSL' records in order to re-establish operations quickly and with minimal interruption and expense.
- 9) Determining the practicality of and, if appropriate, establishing a uniform filing system and a forms design and control system.
- 10) Periodically reviewing the records retention schedules and legislation to determine if DDSL's document management program and its Records Retention Schedule is in compliance with legislation.
- 11) Informing the various department heads of any laws and administrative rules relating to corporate records.
- 12) In conjunction with the HR Department explaining to employees their duties relating to the document management program.
- 13) Ensuring that the maintenance, preservation, microfilming, computer disk storage, destruction or other disposition of DDSL's records is carried out in accordance with this policy, the procedures of the document management program and our legal requirements.

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- 14) Planning the timetable for the annual records destruction exercise and the annual records audit, including setting deadlines for responses from departmental staff.
 - 15) Evaluating the overall effectiveness of the document management program.
 - 16) Reporting annually to the Legal Department on the implementation of the document management program in each of DDSL's departments.

10. Questions About the Policy

Any questions about this policy should be referred to the Data Protection Contact who is in charge of administering, enforcing and updating this policy at dataprivacy@ddsl.ie.

Appendix

Record Retention Schedule

In this policy DDSL establishes retention or destruction schedules or procedures for specific categories of records. This is done to ensure legal compliance and accomplish other objectives, such as protecting intellectual property and controlling costs. Employees should give special consideration to the categories of documents listed in the record retention schedule below. Do not retain a record if there is no business reason for doing so and consult with the Data Protection Contact if unsure.

DDSL Business Records			
Type of data/record	Retention Period	Justification for time frame	Legal basis for processing
Member contact information	6 years from end of last membership season	Section 11 of The Statute of Limitations Act 1957	Consent
Birth Certs	12 months	For business queries and/or legal queries	Consent
Photographs/ID's	2 years – photos of minors are replaced every 2 years due to the minor changing	For business queries and/or legal queries	Consent

Personnel Records			
Type of data/record	Retention Period	Justification for time frame	Legal basis for processing
Benefits descriptions per employee	4 years	Irish employment law	legal obligation
Employee applications and resumes	6 year or, where successful, for the duration of the employment plus 7 years from the date of termination of employment	Section 11 of The Statute of Limitations Act 1957	legal obligation
Employee benefit plans	6 years from when the record was required to be disclosed	Irish employment law	legal obligation
Employee offer letters (and other documentation regarding hiring, promotion, demotion, transfer, termination or selection for training)	6 years from date of making record or action involved, whichever is later, or 1 year from date of involuntary termination	Irish employment law	legal obligation
Records relating to background checks on employees	6 years from when the background check is conducted	Section 11 of The Statute of Limitations Act 1957	legal obligation
Employment contracts; employment and termination agreements	7 years from the date of expiry of the contract or agreement	Section 11 of The Statute of Limitations Act 1957	legal obligation
Employee records with information on pay rate or weekly compensation	3 years	Irish employment law	legal obligation
Tax forms	6 years after date of hire	Revenue	legal obligation
Injury and Illness Incident Reports and related Annual Summaries; Logs of work-related injuries and illnesses	6 years following the end of the calendar year that these records cover	Section 11 of The Statute of Limitations Act 1957	legal obligation
Supplemental record for each occupational injury or illness; Log and Summary of Occupational Injuries and Illnesses	6 years following the year to which they relate	Section 11 of The Statute of Limitations Act 1957	legal obligation
Job descriptions, performance goals and reviews; garnishment records	For the duration of the employment plus 7 years from the date of termination of employment	Irish employment law	legal obligation

Personnel Records cont'd			
Type of data/record	Retention Period	Justification for time frame	Legal basis for processing
Employee tax records	6 years from the date tax is due or paid	Revenue	legal obligation
Personnel or employment records	6 years from the date the record was made	Irish employment law	legal obligation
Pension plan and retirement records	Permanent	Irish employment law	legal obligation
Salary schedules; ranges for each job description	2 years	Irish employment law	legal obligation
Training agreements, summaries of applicants' qualifications, job criteria, interview records	Duration of training + 4 years	Irish employment law	legal obligation

Payroll Records			
Type of data/record	Retention Period	Justification for time frame	Legal basis for processing
Payroll registers (gross and net)	3 years from the last date of entry	Revenue	legal obligation

Corporate Records			
Type of data/record	Retention Period	Justification for time frame	Legal basis for processing
Articles of Incorporation, Bylaws, Corporate Seal	Permanent	Legal queries	legal obligation
Annual corporate filings and reports to secretary of state and attorney general	Permanent	Legal queries	legal obligation
Board policies, resolutions, meeting minutes and committee meeting minutes	Permanent	Legal queries	legal obligation
Contracts	Permanent if current (7 years if expired)	Section 11 of The Statute of Limitations Act 1957	legal obligation

Corporate Records cont'd			
Type of data/record	Retention Period	Justification for time frame	Legal basis for processing
E-mails (business related)	3 years	For business queries	Legitimate Interests
All tax records	Permanent	Revenue	legal obligation
Sales and purchase records	3 years	Revenue	legal obligation

Accounting and Finance			
Type of data/record	Retention Period	Justification for time frame	Legal basis for processing
Accounts Payable and Receivables ledgers and schedules	7 years	Revenue	legal obligation
Annual audit reports and financial statements	Permanent	Revenue	legal obligation
Annual plans and budgets	2 years	Revenue	legal obligation
Bank statements	7 years	Revenue	legal obligation
Business expense records	7 years	Revenue	legal obligation
Cash receipts	3 years	Revenue	legal obligation
Electronic fund transfer documents	7 years	Revenue	legal obligation
Employee expense reports	7 years	Revenue	legal obligation
General ledgers	7 years	Revenue	legal obligation

Accounting and Finance cont'd			
Type of data/record	Retention Period	Justification for time frame	Legal basis for processing
Journal entries	7 years	Revenue	legal obligation
Invoices	7 years	Revenue	legal obligation
Petty cash vouchers	3 years	Revenue	legal obligation

Tax Records			
Type of data/record	Retention Period	Justification for time frame	Legal basis for processing
All tax records	7 years	Revenue	legal obligation

Legal and Insurance Records			
Type of data/record	Retention Period	Justification for time frame	Legal basis for processing
Appraisals	6 years from termination	Section 11 of The Statute of Limitations Act 1957	legal obligation
Insurance claims/ applications	Permanent	Section 11 of The Statute of Limitations Act 1957	legal obligation
Insurance contracts and policies (Director and Officers, General Liability, Property, Workers' Compensation)	Permanent	Section 11 of The Statute of Limitations Act 1957	legal obligation
Leases	12 years after expiration	Business/Legal queries	legal obligation

Data Privacy Records			
Type of data/record	Retention Period	Justification for time frame	Legal basis for processing
Data subject rights requests (DSARs, right to erasure, right to object etc)	1 year from date of request	For business queries	Legitimate Interests
DPIAs	2 years from date of change	For business queries	Legitimate Interests
Data Processing registers	Indefinite	For business queries	Legitimate Interests
Regulatory Queries/complaints	2 years from last correspondence	For business queries	Legitimate Interests
Signed DPAs and SCC's	6 years post relationship end date	For business queries	Legal obligation